

## Danner, Ward

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**From:** Dadap, Nathan C.  
**Sent:** Wednesday, October 23, 2013 5:02 PM  
**To:** Rita Brenner  
**Cc:** Paul Parmentier  
**Subject:** Clarification regarding disposal of PCB Waste

Hi Rita,

Paul had mentioned to me today that the Port of LA wanted some clarification regarding the disposal of PCB waste based on the concentration. You can find the requirements listed in 40 C.F.R. § 761.61(a)(5), but in summary:

1. Soils (which constitute "Bulk PCB remediation wastes") with concentrations below 50 ppm DO NOT need to be disposed of in a hazardous waste landfill.

*761.61(a)(5)(i)(B)(2)(ii)* – Bulk PCB remediation wastes with a PCB concentration of <50 ppm shall be disposed of in accordance with paragraph (a)(5)(v)(A) of this section.

Those facilities include:

- ( 1 ) A facility permitted, licensed, or registered by a State to manage municipal solid waste subject to part 258 of this chapter.
- ( 2 ) A facility permitted, licensed, or registered by a State to manage non-municipal non-hazardous waste subject to §§ 257.5 through 257.30 of this chapter, as applicable.
- ( 3 ) A hazardous waste landfill permitted by EPA under section 3004 of RCRA, or by a State authorized under section 3006 of RCRA.
- ( 4 ) A PCB disposal facility approved under this part.

2. Soils with concentrations 50 ppm or above DO need to be disposed of in a TSCA-approved landfill.

*761.61(a)(5)(i)(B)(2)(iii)* – Bulk PCB remediation wastes with a PCB concentration  $\geq$ 50 ppm shall be disposed of in a hazardous waste landfill permitted by EPA under section 3004 of RCRA, or by a State authorized under section 3006 of RCRA, or a PCB disposal facility approved under this part.

Hope that provides some clarification. Please let me know if you have any other questions.

Thanks,  
Nathan

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